UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

NORMAN SIMMONDS, Inmate No. X0233489;

Plaintiff,

v.

Case No. 22-cv-01479 - VMC Hon. Victoria M. Calvert

MELODY M. MADDOX, et al.,

Defendants.

STIPULATION

Plaintiff Norman Simmonds and Defendant Melody M. Maddox, in her official capacity as Sheriff of DeKalb County, stipulate as follows:

1. Defendant Melody M. Maddox will approve all requests for Kosher meals from Muslim detainees and begin to provide the meals (in the same form that are provided to Jewish inmates) to them immediately, as Kosher meals are understood by Muslims to meet the definition of Halal. Kosher meals must total a minimum of 2,600 calories per day

¹ The Parties currently understand that the Kosher meals meet or exceed federal and state laws, regulations, standards, and guidelines. If the Kosher meals change so that this is no longer the case, or the parties determine in discovery that this is no longer

- and meet or exceed all federal and state laws, regulations, standards, and guidelines for nutrition.
- 2. For all fasting Muslims who do not request Kosher meals, Defendant Melody M. Maddox will provide meals totaling at least 2,600 calories per day, and meet or exceed federal and state laws, regulations, standards, and guidelines for nutrition.
- 3. For all fasting Muslims, Defendant Melody M. Maddox will provide the morning meal at approximately an hour before the morning prayer Fajr) and approximately 10 minutes before the evening prayer (Maghrib)
- 4. Throughout the Ramadan period, Defendant Melody M. Maddox will keep a log of the times meals are delivered, and the food items provided along with caloric values and nutritional information, and will provide that log upon request to Plaintiff's counsel or the Court.
- 5. For all future Ramadans, Defendant Melody M. Maddox will follow the terms of this Stipulation for the entire Ramadan period, until this Stipulation is superseded or terminated.

the case, Defendants agree to provide Halal compliant meals that meet or exceed federal and state laws, regulations, standards, and guidelines.

- 6. Throughout the Ramadan period, Defendant Melody M. Maddox will ensure that times for the Fajr, Dhuhr, Asr, Maghrib and Isha prayers are announced in each pod which houses those observing Ramadan². Defendant Melody M. Maddox will keep a log of the times announcements were made, and will provide that log upon request to Plaintiff's counsel or the Court.
- 7. Defendant Melody M. Maddox will refrain from taking away commissary privileges from Plaintiff and all other fasting Muslims during any Ramadan period, unless the loss of privilege is directly related to a violation of the commissary privilege or a violation of the inmate handbook. Nothing in this paragraph prevents Defendants from revoking commissary as a privilege once Ramadan ends for misconduct that occurs during Ramadan.
- 8. This stipulation will remain in force until terminated or superseded by agreement of the parties, by an Order of the Court, or by the termination of this litigation.

² Prayer times will be determined by https://www.islamicity.org.

SO STIPULATED.

Dated: April 19, 2022

Council on American-Islamic Relations - Georgia Chapter

By: /s/ Javeria Jamil
Javeria Jamil (144674)
j-jamil@cair.com
Murtaza Khwaja (750003)
mkhwaja@cair.com

235 Peachtree Street, Suite 901 Atlanta, GA 30303 Phone: (404) 239-2086 Fax: (470) 570-0389

CAIR LEGAL DEFENSE FUND

Lena F. Masri (VA 93291)°

lmasri@cair.com
Gadeir I. Abbas (VA 81161)* °

gabbas@cair.com
Justin Sadowsky (VA 73382) °

jsadowsky@cair.com
Kimberly Noe-Lehenbauer (OK 34744)** °

knoelehenbauer@cair.com

453 New Jersey Ave., S.E. Washington, DC 20003 Phone: (202) 742-6420 Fax: (202) 488-0833

*Mr. Abbas licensed in VA, not in D.C. Practice limited to federal matters.

**Ms. Noe-Lehenbauer licensed in OK, not in D.C. Practice limited to federal matters.

° Application pro hac vice forthcoming.

/s/ Nikisha L. McDonald Nikisha L. McDonald Supervising Attorney Georgia Bar No. 489573

DeKalb County Law Department 1300 Commerce Drive, 5th Floor Decatur, GA 30030